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July 21, 2025

VIA ECF

Honorable Jeannette A. Vargas
United States District Court
Southern District of New York
500 Pearl St., Room 703
New York, NY 10007

MEMO ENDORSED

Re: *In Re Application of Youngpoong Corp., for an Order Seeking Discovery Pursuant to 28 U.S.C. § 1782, Case No. 1:25-mc-00194-JAV*

Dear Judge Vargas:

We represent Respondents PedalPoint Holdings, LLC (“PedalPoint”), Kevin Hahm, and Janet Ha in the above-referenced matter. Pursuant to Your Honor’s Individual Rule 3.E, we write to seek an extension of time to file a motion to quash subpoenas issued or authorized to be issued pursuant to the Court’s July 2 and July 16 Orders and/or vacate those Orders.

Respondent PedalPoint was served with the subpoenas on July 9, and the subpoenas authorized to be served on Mr. Hahm and Ms. Ha have not yet been served on them. Undersigned counsel have agreed to accept service of those subpoenas on behalf of Mr. Hahm and Ms. Ha following the completion of notice to parties in Korea against whom the requested discovery is likely to be used. The parties agree that such service shall have the same effect as if Mr. Hahm and Ms. Ha were personally served in this district. Respondents reserve all rights, and counsel’s acceptance of service does not waive any arguments under 28 USC § 1782 or the *Intel* factors or relating to the Court’s jurisdiction.

Under Federal Rule of Civil Procedure 45(d), any opposition to the subpoenas served on PedalPoint, including a motion to quash, is due July 23. And any opposition to the subpoenas directed to Mr. Hahm and Ms. Ha would be due 14 days after the service of the subpoenas. Respondents seek a modest extension of time to enable them to file a consolidated response and motion to quash the subpoenas and/or vacate the Orders.

We have conferred with counsel for Applicant Youngpoong Corp., and the parties jointly propose the following briefing schedule:

- **August 7, 2025:** Respondents’ consolidated motion to quash the subpoenas and/or vacate the Court’s July 2 and July 16 Orders.
- **September 5, 2025:** Applicant’s opposition.

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- **September 22, 2025:** Respondents' reply.

This is the parties' first request for an extension, and no conference has been scheduled in this case.

Respectfully Submitted,

/s/ Lucas Bento

Lucas Bento

cc: Counsel of Record (via CM/ECF)

SO ORDERED:


The Honorable Jeannette A. Vargas
United States District Judge
Dated: July 21, 2025